

NEW JERSEY

Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
<p>Introduce Full Legal Name into Driver Licensing System (in Record, on Document)</p>	<p>NJ law allows the Motor Vehicle Commission to collect a legal name. In the past, many records in the MVC database were created with a name construction similar or close to a legal name – but not exactly the legal name (i.e., use of nicknames or Americanization of a Foreign name). Introducing the full legal name will lead to unhappy customers that may be forced to go back to a legal name they have not used for many years.</p> <p>The bigger issue for NJ MVC is the requirement to have all name records be a 125-character variable length field (40 for family, 80 for given, 5 for suffix). This requires a database change and a significant number of programmatic changes to our system. Such changes would involve the CDLIS/PDPS interface and third party vendor interfaces (third party systems as well), along with our internal and point of sale systems in the field. It will also mean a change to the digital license, which has limited real estate.</p> <p>We plan to accomplish the name requirement, complete with history, in a new system that is still at least two years away. If compelled to do so in the current system, it would be an extensive amount of work. On a scale of 1 to 10, with 10 being most complex, the effort would be a 9 or 10.</p>	<p>AAMVA's Uniform ID security model is the base for change. The CDLIS and PDPS systems, which have specific naming convention rules, will comply with the change to a name in a timely fashion to allow states to meet the three-year implementation requirement.</p>
<p>Have following data elements/features on the document:</p>	<p>NJ MVC's current digital license contains all the data elements and security features referred to except for the person's principle residence address. For the most part, the principle address is reflected on the card, but there are records in which a Post Office</p>	<p>That it's not an "either/or" selection, but a matter of showing principle and mailing address.</p>

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37. Full Legal Name 38. Person's Date of Birth 39. Person's Gender 40. Person's DL or ID Card Number 41. Digital Photograph of Person (and retention) 42. Person's Address of Principle Residence 43. Person's Signature 44. Physical Security Features to prevent tampering, counterfeiting or duplication 45. Common Machine Readable Technology:	box appears. We do not have the real estate for more than one address in the current design. So that, along with the larger name configuration, could mean a redesign of the digital document. A redesign will cost significant time and money.	
Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year)	NJ MVC issues a digital license today that is tied to an individual's length of stay.	

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<p>Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date</p>	<p>The digital license is limited in real estate, so this requirement, along with others in the Real ID Act, will force a redesign of the document. This change requires working with the State’s vendor on a redesign and extensive testing of a new document; much like the effort put forth on the initial design of the State’s digital license.</p>	<p>Digimarc is the State’s digital license contractor and this redesign may require a long lead-time since Digimarc has a large number of contracts in the country. Assuming many states will have to do similar redesign, NJ assumes Digimarc will have enough resources to support all contracts. If not, that could place a burden on the States to affect timely response to the Act.</p>
<p>Verification at Source: Enabling your system to electronically verify documentation with:</p> <ol style="list-style-type: none"> 1. SSOLV 2. SAVE 3. DEERS (DOD) 4. Other jurisdiction (DL/ID card) 5. Birth certificate 6. Other...i.e. third party vendors 	<p>Today, NJ MVC has a SSOLV interface (to verify a social security number). A connection to the SAVE program is also operational.</p> <p>DEERS, other jurisdiction check, birth certificate and third party would all be new interfaces with operational components not yet defined.</p> <p>The electronic interfaces would be similar to what we have done to date with other outside entities. There are operational issues bringing more data to the workstation. It adds complexity to the decision making process and whether to license an individual or not.</p>	
<p>Developing access capability to SAVE system</p>	<p>NJ has access to the SAVE program and uses it to verify information on select cases. To make it an integrated function with license issuance would be sizeable effort, and would require</p>	<p>That INS improves the timely application of information to its database so States can use that data in a more dynamic manner. Today,</p>

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	INS to improve on the timely availability of data.	the data may or may not be there because of how long it takes for paper work to make it from the INS field office to the INS system.
<p>Introduce equipment into system to capture digital images of identity source documents so that images can be retained in electronic storage in a transferable format</p>	<p>Requirements for the archiving of Identity documents (or any other need for imaging) will change the dynamics of Motor Vehicles' IT systems. There will be several profound changes as a result of this technology:</p> <ul style="list-style-type: none"> - Greatly enhanced document retrieval after capture - Possible implications to the customer throughput to take the time to capture documents - Likely impact to the network traffic due to the bulk capture of documents over a distributed network (point of service capture, unlike taxation mail in processing for example). <p>Depending on the requirements of imaging, it may be necessary to decentralize hardware to handle the load, and/or deal with distributed capture but centralized enterprise-wide delivery of imaging. Quality of document images is at odds with network bandwidth to deliver the resulting images. Network traffic studies including transaction volume, quality of images, retention, geographic distribution and use, timeliness of retrieval, and centralization vs. de-centralization are all factors that would be appropriate in planning for imaging technology.</p>	
<p>Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of</p>	<p>Significant influence on customer service. This State is an over-the-counter instant issuance service. It will be quite challenging to maintain a smooth license process and capture the images of documents used to verify the identity of a license applicant. To maximize customer throughput, NJ recently re-engineered</p>	<p>That States do not have to maintain both physical copies and images</p>

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10 years	business to eliminate choke points in the process. The image function has great potential to be a choke point unless some mobile and more robust imaging technology is made available. Maintaining physical copies, because of the enormity of the retrieval process, would require extensive and costly warehousing set-ups.	
Subject each person applying for a driver's license or identification card to mandatory facial image capture	This is underway in NJ. According to current law, that image is good for eight years before another image is required.	
Establish an effective procedure to confirm or verify a renewing applicant's information	NJ MVC established a "6 Point Identification Verification" system which standardized how an applicant verifies his identity. Certain documents are considered "Primary" (and given a four-point value), while others are considered "Secondary" (and carry a two-point value). There is also a limit on the number of secondary documents accepted. This process was implemented with the digital license program to ensure that the right person is enrolled in the digital picture database. Along with the "6 Point ID" program, a check of the SSA database is made to verify SSN before licensing a driver. In the renewal process, the picture can be used as another means to verify identity.	
In the event that a social security account number is already registered to or associated with another	The CDLIS /PDPS helpdesk responsibility will have to be expanded to include dealing inter-jurisdictional matters on non-commercial drivers. Should appropriate action be necessary, the State can suspend the license of a driver who provides false	Requires a State-to-State check of a driver license, and that a master pointer record database is developed and operational by AAMVA.net.

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person to which any state has issued a DL/ID card, the state shall resolve the discrepancy and take appropriate action	information.	
Check other states if a person already was issued a DL in another state	This is a large effort. On a scale of 1 to 10, this rates as a 10 effort. Introducing the “all driver license” search with licensing practices in the motor vehicle offices creates a number of customer service challenges. The “all driver search” will increase the number of exceptions that have to be handled by field staff. Technically, it will rival the commercial driver license project of the late 80’s.	This statement implies the “one driver, one record” concept and requires States put in place standard practices to test and license drivers so States can employ reciprocity among State licensing jurisdictions. Requires a State-to-State check of a driver license and that a master pointer record database is developed and operational by AAMVAnet.
Ensure physical security of locations where DL/ID cards are produced	The NJMVC is currently issuing licenses at 45 field locations. In October 2005, the 46 th agency will open. All processes are completed at agency counters. DDL hardware is secured to the counter with a locking device. Consumables are safely out of reach from the general public. When not in use, the equipment is shut down, the security key is removed, and all consumables are stored in a locked and alarmed safe.	Law Enforcement Agency Security Enhancement (L.E.A.S.E.) Program will continue at two thirds of our agencies. An assigned investigator of the MVC’s Security and Investigations Unit will monitor agencies without a L.E.A.S.E. Officer.
Subject all person’s authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	The State already does a complete background check on all employees working for the Commission.	

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Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	Training for all agency, and support staff, is a large part of the initiative and of great importance to the Commission.	Fraudulent document recognition training has been in place since the latter part of 2004. This training will be expanded to include field/regional locations.
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	The current NJ card is good for four years before renewal and the picture is good for eight years. There is thought of moving the card to an eight-year renewal cycle – so this requirement has little impact.	
Alternative document design if it does not meet federal standard	As stated earlier, any alteration of the card, due to limited real estate, would necessitate a costly redesign of the card.	
Legal Presence Requirement	Current NJ Law requires authorized presence in the United States. Proof must be submitted in order to qualify for a NJ license.	Due to the ever-changing aspect of the business, we work closely with representatives from Immigration to be sure the latest information is available to our field staff.
Provide electronic access to all other states to information contained in the motor vehicle database of the state	NJ would like to use the infrastructure in place to facilitate commercial driver license access to State data. Absent that system, the check can only be done if the customer identifies the last State of record.	If the State of record is known, then a State-to-State communication can be constructed. If not known, then a master pointer record database has to be operational by AAMVANet.

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<p>Maintain a state motor vehicle database that contains at a minimum:</p> <ul style="list-style-type: none"> ▪ All data fields printed on DL/ID cards ▪ Motor vehicle driver's histories, including motor vehicle violations, suspensions and points on licenses 	<p>Little impact as this already exists</p>	
<p>Optional Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.</p>	<p>Again this would entail a re-design of the digital document and some programming changes to differentiate a certificate of driving from a driver license/identity document.</p>	<p>The only difference functionally between the two is that one can be used to establish identity and the other cannot be for Federal purposes and must bear that clarification.</p>

What questions does your jurisdiction have as a result of the passing of the Real ID Act?

The Act requires that all states implement in a three (3) year period. States cannot move their entire population through a new standard of licensing in that time period. How will States treat drivers with licenses not issued under the new standard, such as proof of residence or checking another State database? Does the Act require States to implement in three years and handle the new standards during renewal process (forcing all drivers into a motor vehicle office one time) or is it implied that all states will have to take special steps so the entire

population of licensed drivers can be licensed according to the new standard and issued a new document in three years. The latter seems unrealistic!

NJ has attempted to be consistent with the Uniformed ID Security model. With Homeland Security Office in charge of the Act, does AAMVA have any idea whether the model will form a base for the new standards?

Answers to this survey are provided based on what we think we know. Should the eventual implementation rules vary dramatically it will influence States' ability to comply. When will the Federal Government provide guidance on the program?

If your jurisdiction has done an impact analysis please provide us with a copy of the analysis.